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November 7, 2018

**VIA ECF**

The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Glen Craig v. Getty Images (US), Inc., et al.*, Case No. 1: 17 Civ. 9916  
(AJN): Letter Motion for Extension of Discovery Deadlines and  
Leave to File Amended Complaint**

Dear Judge Nathan:

Pursuant to Your Honor's Individual Rules 1.A and 1.D, undersigned counsel for defendant Getty Images (US), Inc. ("Getty Images") and counsel for plaintiff Glen Craig ("Plaintiff") respectfully submit this joint letter to request an extension of the fact and expert discovery deadlines set forth in the above-captioned action.

Under paragraph 7 of the parties' Civil Case Management Plan and Scheduling Order (Dkt. No. 98, the "Order"), the completion of fact discovery is currently set for November 16, 2018. Under paragraph 9 of the Order, completion of expert discovery is currently set for December 31, 2018. As described further below, this case has been resolved as to all defendants except for Getty Images and the Associated Press, and the parties are engaged in settlement discussions that would resolve the case with respect to Getty Images. The parties are making progress and believe that they will be able to resolve the case as between Plaintiff and Getty Images either through continued discussions or perhaps mediation, and therefore jointly propose extending the fact discovery deadline from November 16, 2018 to December 17, 2018, and the expert discovery deadline from December 31, 2018 to January 31, 2019, so that the parties can focus their efforts on settlement.

Both Getty Images and Plaintiff consent to this request, which is the first request for an adjournment of the deadlines identified above. Granting this extension will not impact any other scheduled dates, and the parties will work together pursuant to paragraph 8 of the Order should any extensions of the interim deadlines be required.

Separately, the parties have recently executed a settlement agreement with respect to the following defendants: American Broadcasting Company; BBC Worldwide Americas, Inc.; Bloomberg, L.P.; CNN America, Inc.; Condé Nast Entertainment LLC; Daily News, L.P. (incorrectly sued as New York Daily News Company); Hearst Communications, Inc.; MSNBC Cable, LLC; NBCUniversal Media, LLC; Oath, Inc.; Prometheus Global, LLC; Rolling Stone, LLC, and Time, Inc. Further to Plaintiff's pending Motion for Leave to



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File a First Amended Complaint (Dkt. Nos. 102-104, the “Motion”), Plaintiff reiterates his requests for leave to file the Amended Complaint marked as Exhibit A to the Motion noting Getty Images and the Associated Press as the only remaining defendants in this action. Getty Images does not oppose this request.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/

Scott J. Sholder, *counsel for defendant Getty Images*

Angelo DiStefano, *counsel for plaintiff Glen Craig*